

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of the Commission's Rules	)	WT Docket No. 02-318
Concerning Airport Terminal Use Frequencies	)	RM-10184
in the 450-470 MHz Band of the Private Land	)	
Mobile Radio Services	)	

**EX PARTE COMMENTS OF PCIA**

PCIA, the Wireless Infrastructure Association, hereby respectfully submits the following Ex Parte Comments in the above-captioned proceeding.

This proceeding was initiated as the result of a Petition for Rule Making filed by PCIA in June of 2001. It was necessitated by changes in the Universal Licensing System and growing incidences of airlines being unable to communicate within the airport grounds. The Commission's Notice of Proposed Rule Making ("NPRM") asks several questions regarding PCIA's proposal, and offers some potential alternatives.<sup>1</sup>

While PCIA's comments addressed in detail various aspects of this proceeding, including support for an increased ERP for mobile units, PCIA did not address the specific ERP limitation for mobile units. Therefore, PCIA herein supplements the Commission's record in this proceeding.

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<sup>1</sup>*See, Amendment of the Commission's Rules Concerning Airport Terminal Use Frequencies in the 450-470 MHz Band of the Private Land Mobile Radio Services, Notice of Proposed Rulemaking, WT Docket No. 02-318, 17 FCC Rcd 19904 (2002).*

It is important that the Commission select power limits that enable airline licensees to communicate reliably at the airport, using “off the shelf” equipment, while at the same time not cause interference to other users. Accordingly, PCIA would suggest an ERP limit for mobile units of forty (40) watts. Such radios are readily available, provide sufficient coverage in below-grade areas around airports, and represent the proper balance between a typical airport system’s “talk-out” versus “talk-in” range. Limiting the ERP to forty (40), even though 110 watt radios are available, will limit the possibility of airport systems interfering with co-channel users.

WHEREFORE, the premises considered, it is respectfully requested that the Commission act in accordance with the views expressed herein.

Respectfully submitted,

PCIA, The Wireless Infrastructure Association

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